IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

First Named Applicant: James T. Bezanson	
Application No.: 10/800,975 (CONF 1393)	Group Art Unit: 4152
Filed: 3/14/2004	Examiner: Ho T. Shiu
Title: Unattended installation of drivers for devices That are not automatically found and installed During operating system installation	
Attorney Docket No.: BEA920030032US1	

APPEAL BRIEF

This Appeal Brief is organized in accordance with the requirements set forth in 37 CFR 41.37(c).

Real party in interest

The real party in interest is International Business Machines Corporation (hereinafter, "IBM"), of Armonk, New York. All applicants of the present patent application have assigned their rights to the invention to IBM.

Related appeals and interferences

There are no related appeals or interferences to the present patent application.

Status of claims

Claims 1-25 were originally filed in this patent application. Claims 1 and 13 were amended during prosecution, and claims 15-25 were cancelled during prosecution. Therefore, claims 1-14 remain pending in the present patent application, and their rejection is being appealed herein.

Status of amendments

No claim amendments were proposed within the most recent final office action response of March 29, 2009. Therefore, there are no unentered claim amendments pending in the present patent application. In the advisory action of April 13, 2009, the Examiner did indicate that the proposed amendments will be entered (see box 7.b). However, Applicant is unaware of which proposed amendments the Examiner is referring to, insofar as Applicant did not propose any amendments in the final office action response of March 29, 2009.

Summary of claimed subject matter

Claim 1 is an independent claim, and is directed to a method (method 300 of FIG. 3; p. 13, ll. 5-9). In the method, a server computing system responsible for installing operating systems on client computing systems determines which drivers are needed for devices on the client computing systems that are not automatically found and installed on the client computing systems during vendor-specified operating system installation on the client computing systems (part 302 of FIG. 3; p. 13, l. 19, through p. 14, l. 2). The server computing system creates entries for the drivers within a master driver file, without user interaction (part 304 of FIG. 3; p. 14, ll. 3-12). Furthermore, for each client computing system, the server computing system creates references within an unattended installation file for the client computing system to the entries for the drivers for the client computing system within the master driver file (part 310 of FIG. 3; p. 19, ll. 13-18). The unattended installation file is a different file than the master driver file is (in FIGs. 2D-2E, the unattended installation file 208 is depicted as being a different file than the master driver file 202 is).

Claim 13 is an independent claim, and is also directed to a method (method 300 of FIG. 3; p. 13, ll. 5-9). In the method, a server computing system responsible for installing operating systems on client computing systems determines which drivers are needed for devices on the client computing systems that are not automatically found and installed on the client computing systems during vendor-specified operating system installation on the client computing systems (part 302 of

FIG. 3; p. 13, l. 19, through p. 14, l. 2). The server computing system creates entries for the drivers within a master driver file that are not already present within the master driver file as stored on the server computing system, without user interaction (part 304 of FIG. 3; p. 14, ll. 3-12). The master driver file is copied to each client computing system (part 306 of FIG. 3; p. 19, ll. 8-13), and the drivers that are needed for the devices on each client computing system are copied to the client computing system (part 308 of FIG. 3; p. 19, ll. 8-10). Furthermore, for each client computing system, the server computing system creates references within an unattended installation file for the client computing system to the entries for the drivers for the client computing system within the master driver file as copied to the client computing system (part 310 of FIG. 3; p. 19, ll. 13-18). The operating systems are remotely installed on the client computing systems in an unattended manner, where the drivers of the devices for the client computing systems are able to be installed in the unattended manner due to the references created within the unattended installation files to the entries for the drivers of the devices within the master driver file (part 312 of FIG. 3; p. 21, ll. 6-14). The unattended installation file is a different file than the master driver file is (in FIGs. 2D-2E, the unattended installation file 208 is depicted as being a different file than the master driver file 202 is).

Grounds of rejection to be reviewed on appeal

There are five grounds of rejection to be reviewed on appeal. The first ground of rejection is whether claims 1, 4-9, and 12 have been properly rejected under 35 USC 103(a) as being unpatentable over Poppenga (2003/0120624), in view of Kaplan (6,594,674), in further view of Maxwell (6,567,860), in even further view of Smith (2002/0069353), and in still even further view of official notice, for a total of four references plus official notice. The second ground of rejection is whether claims 2 and 3 have been properly rejected under 35 USC 103(a) as being unpatentable over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, in still even further view of official notice, and in still even additional further view of Barmettler (2003/0023770), for a total of five references plus official notice. The third ground of rejection is

whether claim 10 has been properly rejected under 35 USC 103(a) as being unpatentable over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, in still even further view of official notice, and in still even additional further view of Platt (5,421,009), for a total of five references plus official notice. The fourth ground of rejection is whether claim 13 has been properly rejected under 35 USC 103(a) over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, in still even further view of official notice, and in still even additional further view of Platt, for a total of five reference plus official notice. Applicant notes that the third and the fourth grounds of rejection are over the same prior art in combination; however, Applicant has maintained these grounds of rejection as separate grounds because the Examiner grouped them separately in the final office action of February 2, 2009 (see p. 9, paras. 16 and 18). The fifth ground of rejection is whether claim 14 has been properly rejected under 35 USC 103(a) over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, in still even further view of official notice, in still even additional further view of Platt, and in still even additional further view of Barmettler, for a total of six references plus official notice.

Argument

I. First ground of rejection

Applicant respectfully submits that the Examiner erred in rejecting claims 1, 4-9, and 12 under 35 USC 103(a) as being unpatentable over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, and in still even further view of official notice, which is a total of four references plus official notice. Claim 1 is an independent claim, and claims 4-9 and 12 depend from claim 1. Applicant respectfully submits that claim 1 is patentable over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, and in still even further view of official notice. As such, claims 4-9 and 12 are patentable at least because they depend from a patentable base independent claim.

Applicant discusses three separate and independent reasons why the invention of claim 1 is patentable over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, and in still even further view of official notice. Applicant presents all three reasons in the appeal brief because Applicant believes that all three reasons are legitimate reasons why the invention of claim 1 is patentable. Nevertheless, the Board need only agree with one of these three reasons to overturn the Examiner's rejection of claims 1, 4-9, and 12.

I.A. First reason why invention of claim 1 is patentable

Claim 1 recites "creating *references* within an unattended installation file for the client computing system *to the entries* for the drivers of the devices for the client computing system *within the master driver file*." That is, *references* to the entries within the master driver file are *created within the unattended installation file*. Applicant notes that the terminology "reference" is relevantly defined by the Internet web site www.wikipedia.org as "an object containing information which refers to data stored elsewhere, as opposed to containing the data itself" (see en.wikipedia.org/wiki/Dereference). This, in the claimed invention the reference created within the unattended installation file is an object that refers to the data (i.e., the driver entry) stored elsewhere (i.e., within the master driver file), as opposed to this data/driver entry being stored within the unattended installation file itself.

Applicant respectfully submits that the cited prior art in combination does not suggest this aspect of the invention. The Examiner has indicated that the cited prior art in combination suggests this inventive aspect in paragraph [0032], lines 1-12, of Poppenga (see final office action of February 2, 2009, p. 3, ll. 2-3). However, in this paragraph, a "driver package builder 34 retrieves the initially selected from the device driver database 30 and automatically generates an appropriate accompanying configuration file o[r] files . . . to accompany the driver installation" such that the "automatically selected driver and accompanying configuration files are made available to the customer 20 via the MPP website 18 for automatic downloading, installation, and configuration."

It is thus readily apparent that no *reference* is created within the unattended installation file to an *entry* for a driver file *within the master driver file* in the cited prior art in combination. The driver file *itself* is retrieved from the device driver database 30, the latter which presumably corresponds to the master driver file of the invention. As such, no reference is created to an *entry* within the database 30, but rather the entire driver file is *itself* retrieved in the cited prior art in combination. For instance, the configuration files do not have any *reference* created within them *to an entry* for a driver *within the database 30*; rather, at best, the configuration files refer to the *driver file itself* – and not to the *entry* for the driver file, as in the claimed invention.

Stated another way, in the claimed invention you create an entry within a master driver file, and then you create a reference within an unattended installation file to this entry within the master driver file. By comparison, in the cited prior art in combination, you retrieve a driver file from the master driver file, and then you may create a reference within the configuration file to this driver file itself. You do not create a *reference within the configuration file to an entry within the master driver file* in the cited prior art in combination (where this entry is for a driver file), in contradistinction to the claimed invention. Indeed, it would not make sense to do so, since the cited prior art in combination *retrieves the entire driver file* from the master driver file, and the driver file is passed to the client computing system; that is, if you are passing the entire driver file to the client computing system, then you do not have to create any reference to an entry for this driver file as stored in the master drive file, because you *already have* the driver file and can reference it directly. Compare this situation to the invention, in which you just create a reference to an *entry* for the driver file within the master driver file.

Applicant notes in this respect that the standard for obviousness requires that the claimed invention be considered "as a whole" (MPEP sec. 2141.02.I.), taking into account all the claim language of the claim, and not just distilling the invention down to its "gist" or "thrust" (Id.). "Distilling an invention down to the 'gist' or 'thrust' of an invention disregards the requirement of analyzing the subject matter 'as a whole'" (W.L. Gore & Associates, Inc. v. Garlock, Inc., 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983)). "All words in a claim must be considered in judging

the patentability of that claim against the prior art" (In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)).

Therefore, the Examiner's error is that he has failed to consider all the words of the claim in judging the patentability of the claim against the prior art. Rather, the Examiner considered just the gist or thrust of claim 1 in rejecting this claim over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, and in still even further view of official notice. For just this foregoing reason, then, the claimed invention is *prima facie* nonobvious and patentable over the cited prior art in combination, and Applicant requests the Board to overturn the Examiner's rejection of claims 1, 4-9, and 12.

I.B. Second reason why invention of claim 1 is patentable

Claim 1 also recites that "determining which drivers are needed for devices on the client computing systems that are not automatically found and installed during vendor-specified operating system installation," "creating entries for the drivers within a master driver file," and "for each client computing system, creating references within an unattended installation file to the entries for the drivers within the master driver file" are all performed *by a server computing system responsible for installing operating systems on the client computing systems* (see patent application as filed, p. 8, ll. 18-19; p. 10, ll. 15-16; p. 11, ll. 1-2; and p. 12, ll. 3-6). That is, it is not just any server computing system that performs this functionality, but rather the server computing system that is responsible for installing operating systems on the client computing systems that performs this functionality.

Applicant respectfully submits that the cited prior art in combination does not suggest this aspect of the invention as amended. The Examiner has particularly relied upon Maxwell as suggesting that a server computing system is responsible for installing operating systems on client computing systems in rejecting the claimed invention over the cited prior art in combination (see final office action of February 2, 2009, p. 4, first para.). However, Maxwell does not disclose this. The passage of Maxwell relied by the Examiner, for instance, merely states that "[a] method and apparatus are disclosed for inputting new device driver information into a Personal Computer

(PC) in an existing computer network so as to enable the Operating System (OS) to recognize the new hardware device during installation of the OS and to permit the OS to automatically install the associated device driver" (col. 4, ll. 1-8). There is no discussion here of a server computing system being responsible for installing operating systems on client computing systems; Maxwell simply discloses that device drivers are input into a PC so that during installation of the OS the OS can automatically install the device drivers. Thus, even under the Examiner's proffered interpretation of the prior art in combination, the claimed invention is not suggested by this combination of the prior art.

In fact, the base reference Poppenga actually teaches away from the servers being responsible for installing operating systems on the client computing systems. This is because the client computing system 20 interacts with the servers 12/14 over a web site 18 (see, e.g., Poppenga, paras. [0027]-[0032]). However, if an operating system is not yet installed on the client computing system 20 (i.e., such that the servers 12/14 are responsible for installing the operating system on the client computing system 20 as in the invention), then there is no way for the client computing system 20 to communicate with the servers 12/14 over the web site 18. Thus, the servers 12/14 cannot be responsible for installing an operating system on the client computing system 20 if the servers 12/14 cannot communicate with the client computing system 20 prior to the operating system being installed on the client computing system 20. That is, communication between the client computing system 20 with the servers 12/14 over the web site 18 requires that an operating system already has been installed on the client computing system 20. Therefore, the servers 12/14 communicate with the client computing system 20 over the web site 18 after the operating system has already been installed on the client computing system 20, and thus cannot be responsible for installing the operating system on the client computing system 20, as in the claimed invention.

In KSR Int'l Co. v. Teleflex, Inc., 550 US 298 (2007), the Supreme Court stated that "when the prior art teaches away from combining certain known elements, discovery of a successful means of combining them is likely to be nonobvious" (KSR, slip opinion at 12), referring to its earlier decision United States v. Adams, 383 US 39 (1966). That is the case here.

The base reference Poppenga teaches away from installation of operating systems on client computing systems. The reference that the Examiner specifically relies upon as teaching this aspect of the invention, Maxwell, does not cure this defect; indeed, it is completely silent as to this aspect of the invention. Therefore, the prior art in combination does not suggest the claimed invention – being silent as to one of the aspects of the invention – and indeed teaches away from the claimed invention, such that claim 1 is not *prima facie* obvious and unpatentable for these reasons as well. As such, Applicant respectfully requests that the Board overturn the Examiner's rejection of claims 1, 4-9, and 12.

I.C. Third reason why invention of claim 1 is patentable

Claim 1 is also limited such that the server computing system creates entries for the drivers within a master driver file *without user interaction*. That is, the creation of the entries within the master driver file is performed by the server computing system *without user interaction*. For instance, in the patent application as filed, the server computing system 102 determines which of these drivers are needed, as described on page 10, lines 15-22. Thereafter, the server computing system 102 creates the entries for these drivers, as described on page 11, lines 1-15. This process is part of an "unattended" operating installation process provided by the invention, as described on page 6, lines 1-22. This process is thus advantageous over prior art processes requiring "manual" installation, as described on page 4, lines 5-14. Therefore, the server computing system creating entries for the drivers within the master driver file *without user interaction* is inherent within the patent application as filed.

Applicant respectfully submits that the prior art in combination does not suggest this aspect of the invention, and indeed teaches away from this aspect of the invention. The Examiner has indicated that the prior art in combination suggests the creation of entries for drivers within a master driver file in paragraph [0030] of Poppenga (see final office action, p. 3, ll. 2-3). It is noted that in this paragraph, a "customer obtains the asset number of the desired printer 26 either by a search of the MPP website 18 or via visual inspection of an identification tag on the desired printer 26," such that "the customer selects or enters the printer asset number into an appropriate

field of the MPP website 18 to initiate automatic driver selection, downloading, installation, and configuring." As such, it cannot be said that the creation of driver entries within a master driver file is performed in the prior art in combination *without user interaction* as in the claimed invention. Rather, Poppenga teaches away from this aspect of the invention, in that a customer (i.e., a user) has to obtain an asset number of the desired printer, where this asset number that is user-obtained permits a corresponding driver entry to be created.

Now, the Examiner has stated that Maxwell and Smith suggest the lack of user interaction in correspondence with the claimed invention. However, such recitation of Maxwell and Smith ignores the basic fact that Poppenga itself teaches away from the claimed invention. The "nature of the teaching [of the prior art] is highly relevant" in determining obviousness (MPEP sec. 2145.X.D.1), and that the "prior art must be considered in its entirety, including disclosures that teach away from the claims" (MPEP sec. 2143.02.VI). Therefore, it is not enough that the Examiner has seemingly provided references suggesting lack of user interaction in correspondence with the claimed invention to show obviousness – the Examiner has failed to consider the entirety of the base reference Poppenga, which teaches away from combination with Maxwell and Smith.

Furthermore, Maxwell and Smith do not actually suggest *the server computing system creating entries for the drivers within the master driver file without user interaction*, which is the entire limitation of the claimed invention that is the subject of this inquiry. As to Maxwell, the Examiner says that because column 3, lines 15-19 thereof state that "[t]he method claimed may also include steps wherein . . . a special graphical user interface (GUI) [is] displayed," that this necessarily means that such user interaction/GUI is not *required* (p. 4 of final office action of February 2, 2009). This line of reasoning is suspect in a number of ways.

First, the Examiner confuses that Maxwell states that the "*claimed* method" *may* include user interaction; however, the issue as to what Maxwell does and does not disclose or suggest is not what is claimed, but what it actually discloses or suggests. In this respect, Maxwell discloses and suggests user interaction in the way of a GUI – just because its *claimed* method may not be limited to such user interaction does not mean that Maxwell *itself* suggests such lack of user interaction as in the invention. Maxwell simply does not disclose or suggest a lack of user

interaction as in the invention; that is to say, the fact that Maxwell claims a method that is not necessarily limited to user interaction does not mean that it discloses or suggests this.

Second, the Examiner has interpreted that Maxwell's recitation that "the method claimed may include . . . a special graphical user interface (GUI)" as meaning that Maxwell does not require a GUI is just *one* interpretation of this passage, which is not guided by Maxwell itself, but rather is informed solely by the claimed invention. For example, it is just as reasonable to conclude that Maxwell implies that a GUI is required, but that a *special* GUI is claimed in one particular method thereof, such that other embodiments may merely use a *standard, non-special* GUI, for instance. The only reason that the Examiner has interpreted Maxwell as he has done to say that this passage of Maxwell implies that a GUI is not required in other embodiments is that this is what the claimed invention requires – not what Maxwell actually suggests. However, one cannot use hindsight reconstruction to pick and choose among the prior art to deprecate the claimed invention (In re Fritch, 972 F.2d 1260 (Fed Cir. 1992)).

Third, and perhaps most importantly, the Examiner has considered the claim limitation "without user interaction" in isolation. However, the claimed invention has to be considered as a whole – the relevant inquiry here is thus whether the Maxwell suggests "the server computing system creating entries for the drivers within the master driver file *without user interaction*," and "without user interaction" by itself. The claimed invention is to be considered "as a whole" (MPEP sec. 2141.02.I.), taking into account all the claim language of the claim. "All words in a claim must be considered in judging the patentability of that claim against the prior art" (In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)). As noted above, the base reference Poppenga is relied upon by the Examiner as suggesting the creation of entries for drivers within a driver file – however, as also noted above, Poppenga creates such entries *with* user interaction, and not *without* user interaction. The fact that Maxwell may *at best* suggest no user interaction to perform something else entirely (i.e., other than creating driver entries within a driver file) does not mean that the resulting combination of Poppenga, Maxwell, and the other prior art rises to the level of suggesting the entirety of this claim limitation.

That is, the Examiner has to show how the prior art suggests the server computing system creates driver entries without user interaction. However, what the prior art the Examiner relies upon actually suggests is that the server computing system creates driver entries *with* user interaction (per Poppenga), and that there is *no* user interaction as to something else entirety (per Maxwell). One of ordinary skill within the art thus would not be prompted to combine these references to yield the claimed invention. Rather, one of ordinary skill within the art would be led to combine these references such that the server computing system creates driver entries with user interaction (per Poppenga), and performs something else entirely without user interaction (per Maxwell).

Finally, as to Smith, the Examiner has also stated that this reference suggests in paragraph [0013] the claim limitation in question (see final office action of February 2, 2009, p. 4, last para.). However, Smith simply discloses in this paragraph that a "configuration information file containing data [is] used by a computer system to automatically install a first device driver and allocate computer system resources without user interaction." This is not what the claimed invention is limited to. Applicant is not claiming the automatic installation of a device driver without user interaction, but rather the creation of driver entries by a server computing system within a driver file without user interaction – something completely different. Again, the Examiner has not shown how the prior art suggests what the claimed invention is actually limited to. The prior art the Examiner actually relies upon, Poppenga, to suggest a server computing system creating driver entries does so with user interaction, not without user interaction. The fact that other prior art, Smith, does something completely different without user interaction does not change this fact. As is the case with Maxwell, one of ordinary skill within the art would be led to combine these references such that the server computing system creates driver entries with user interaction (per Poppenga), and performs something else entirely without user interaction (per Smith). For all of these reasons as well, then, claim 1 is not *prima facie* obvious and unpatentable over the cited prior art in combination, and Applicant respectfully requests that the Board overturn the Examiner's rejection of claims 1, 4-9, and 12.

II. Second ground of rejection

Applicant respectfully submits that the Examiner erred in rejecting claims 2 and 3 under 35 USC 103(a) as being unpatentable over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, in still even further view of official notice, and in still even additional further view of Barmettler, which is a total of five references plus official notice. Claims 2 and 3 are dependent claims, depending from independent claim 1. Therefore, insofar as claim 1 is patentable, claims 2 and 3 are, too.

III. Third ground of rejection

Applicant respectfully submits that the Examiner erred in rejecting claim 10 under 35 USC 103(a) as being unpatentable over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, in still even further view of official notice, and in still even additional further view of Platt, which is a total of five references plus official notice. Claim 10 is a dependent claim, depending from independent claim 1. Therefore, insofar as claim 1 is patentable, claim 10 is, too.

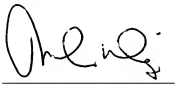
IV. Fourth ground of rejection

Applicant respectfully submits that the Examiner erred in rejecting claim 13 under 35 USC 103(a) as being unpatentable over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, in still even further view of official notice, and in still even additional further view of Platt, which is a total of five references plus official notice. Claim 13 is an independent claim, which includes at least substantially the same subject matter as independent claim 1 does. Furthermore, the Examiner rejected claim 13 by interpreting the prior art of record in the same way as the Examiner did in rejecting claim 1. Therefore, Applicant respectfully submits that claim 13 is patentable, for at least substantially the same reasons that claim 1 is patentable, as has been discussed above.

V. Fifth ground of rejection

Applicant respectfully submits that the Examiner erred in rejecting claim 14 under 35 USC 103(a) as being unpatentable over Poppenga, in view of Kaplan, in further view of Maxwell, in even further view of Smith, in still even further view of official notice, in still even additional further view of Platt, and in still even additional further view of Barmettler, which is a total of six references plus official notice. Claim 14 is a dependent claim, depending from independent claim 13. Therefore, insofar as claim 13 is patentable, claim 14 is, too.

Respectfully Submitted,



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Claims Appendix: Listing of claims on appeal

1. (previously presented) A method comprising:

determining, by a server computing system responsible for installing operating systems on client computing systems, which drivers are needed for devices on the client computing systems that are not automatically found and installed on the client computing systems during vendor-specified operating system installation on the client computing systems;

creating without user interaction, by the server computing system, entries for the drivers within a master driver file; and,

for each client computing system, creating references within an unattended installation file for the client computing system to the entries for the drivers of the devices for the client computing system within the master driver file, by the server computing system,

wherein the unattended installation file is a different file than the master driver file is.

2. (original) The method of claim 1, wherein determining which drivers are needed for the devices on the client computing systems that are not automatically found and installed on the client computing systems during operating system installation comprises determining which drivers are needed for mass storage devices on the client computing systems that are not automatically found and installed on the client computing systems during vendor-specified operating system installation.

3. (original) The method of claim 1, wherein determining which drivers are needed for the devices on the client computing systems that are not automatically found and installed on the client computing systems during operating system installation comprises remotely scanning hardware on the client computing systems to learn of the devices that are not automatically found and installed on the client computing systems during operating system installation.

4. (original) The method of claim 1, wherein creating entries for the drivers within the master driver file comprises creating entries for the drivers within the master driver file that are not already present within the master driver file.

5. (original) The method of claim 1, wherein creating entries for the drivers within the master driver file comprises creating entries for the drivers within the master driver file as stored on a server computing system.

6. (original) The method of claim 5, further comprising copying the master driver file to each client computing system, wherein creating references within the unattended installation file for each client computing system to the entries for the drivers of the devices within the master driver file comprises creating the references to the entries for the drivers of the devices within the master driver file as copied to the client computing system.

7. (original) The method of claim 6, wherein copying the master driver file to each client computing system comprises copying the master driver file in its entirety to each client computing system.

8. (original) The method of claim 6, wherein copying the master driver file to each client computing system comprises, for each client computing system, copying only those parts of the master driver file that include the entries for the drivers that are needed for the devices on the client computing system.

9. (original) The method of claim 1, further comprising, for each client computing system, copying the drivers that are needed for the devices on the client computing system to the client computing system.

10. (original) The method of claim 1, further comprising remotely installing operating systems on the client computing systems in an unattended manner, where the drivers of the devices for the client computing systems are able to be installed in the unattended manner due to the references created within the unattended installation files to the entries for the drivers of the devices within the master driver file.

11. (original) The method of claim 1, wherein the master driver file is a text mode driver file.

12. (original) The method of claim 1, wherein the unattended installation file for each client computing system is an operating system installation answer file for the client computing system.

13. (previously presented) A method comprising:

determining, by a server computing system responsible for installing operating systems on client computing systems, which drivers are needed for devices on the client computing systems that are not automatically found and installed on the client computing systems during vendor-specified operating system installation on the client computing systems;

creating without user interaction, by the server computing system, entries for the drivers within a master driver file that are not already present within the master driver file as stored on the server computing system;

copying the master driver file to each client computing system;

copying the drivers that are needed for the devices on each client computing system to the client computing system;

for each client computing system, creating references within an unattended installation file for the client computing system to the entries for the drivers of the devices for the client computing system within the master driver file as copied to the client computing system, by the server computing system; and,

remotely installing operating systems on the client computing systems in an unattended manner, where the drivers of the devices for the client computing systems are able to be installed

in the unattended manner due to the references created within the unattended installation files to the entries for the drivers of the devices within the master driver file,

wherein the unattended installation file is a different file than the master driver file is.

14. (original) The method of claim 13, wherein the devices on client computing systems that are not automatically found and installed on the client computing systems during vendor-specified operating system installation on the client computing systems are mass storage devices.

15.-25. (cancelled)

Evidence Appendix

(No evidence was submitted pursuant to Rules 130, 131, and 132, and therefore, this section is blank.)

Related Proceedings Appendix

(There are no related proceedings to this patent application, and therefore, this section is blank.)